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Attorney for Defendant
NICHOLAS SOLIS

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

NICHOLAS SOLIS

Defendant.

Case: 1:21-cr-00083-ADA-BAM

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT;
ORDER**

DATE: October 2, 2023

TIME: 1:00pm

COURT: Hon. Ana De Alba

Plaintiff United States of America, by and through its counsel of record, and
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This matter is currently set for sentencing on October 2, 2023 in this Court.
2. By this stipulation, defendant now moves to continue the sentencing until **November 27, 2023**, and to exclude time between **October 2, 2023**, and **November 27, 2023**, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:

- 1 a) Counsel for defendant desires additional time to prepare for the
2 sentencing due to currently being unavailable due to the ongoing trial
3 in the Fresno Superior Court, Department 74 in the People v. Marc
4 Anthony Roque.
5 b) Counsel for defendant believes that failure to grant the above-requested
6 continuance would deny him the reasonable time necessary for effective
7 preparation, taking into account the exercise of due diligence.
8 c) The government does not object to the continuance.
9 d) Nothing in this stipulation and order shall preclude a finding that other
10 provisions of the Speedy Trial Act dictate that additional time periods
11 are excludable from the period within which a trial must commence.

12 IT IS SO STIPULATED.

13 Dated: September 27, 2023


PHILLIP A. TALBERT
United States Attorney
/S/ KIMBERLY SANCHEZ
KIMBERLY SANCHEZ
Assistant United States Attorney

16 Dated: September 27, 2023

/s/ YAN SHRAYBERMAN
YAN SHRAYBERMAN
Counsel for Defendant

19 IT IS SO ORDERED.

20 Dated: September 27, 2023


UNITED STATES DISTRICT JUDGE